

## REMARKS

Claims 1, 2, 6, 8-13 and 15-20 have been amended in this response to clarify the invention. Claims 3-5 and 7 were previously cancelled and claim 14 was previously presented. Claims 1, 2, 6, 8-20 are currently pending.

### Claim Rejection §103

The claims were rejected under 35 U.S.C. Section 103(a) as being unpatentable over U.S. Patent No. 6045671 to Wu (Wu) with or without a combination with other art. Applicant respectfully disagrees. With regard to independent claim 1, the present invention as claimed provides clusters of plasma guns that simultaneously deposit multiple materials onto a spot to create multiple, different combinatorial catalyst samples for testing (see paragraph [0006] for example). Examiner agrees that Wu does not disclose clusters of independently controllable plasma guns, but states that the disclosure of closely aligned plasma source cells 160 in US Application Publication No. 20020000779 to Anders ("Anders") could be combined with Wu to produce the present invention.

The present invention's clusters of plasma deposition guns allow for focusing the plasma stream of each gun (see Figure 3) in the cluster on the same specific spot (see Figure 1, partial view shown) on the substrate (see paragraph [0021] for example).

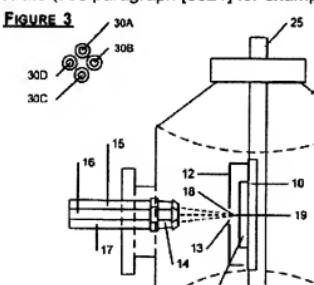
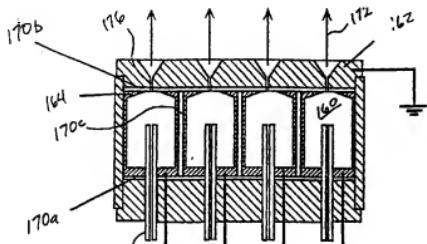


FIGURE 1

Anders, on the other hand, discloses coating large areas on substrates (see Anders at paragraph [0094]). To accomplish large-area coatings, the plasma in Anders is outputted from long slits and the substrate is moved perpendicular to the slit (see Anders at paragraph [0113], and Fig 9):



As shown by the parallel arrows in Anders' FIG. 9, such an arrangement allows for wide area coating, but the guns are not, and could not be, focused on the same spot on the substrate.

Combining Anders with Wu would not produce the present invention. One skilled in the art would have no motivation to change Anders' parallel guns used for wide area deposition to an array of guns focused on the same discrete spot, *inter alia*, a unique feature of the present invention, and would not have thought the present invention obvious in light of Anders and Wu, or Wu and Anders combined with any of the other art cited. In view of the novel features of claim 1, and in that all the remaining claims depend on claim 1, it is respectfully submitted that this application is patentably distinguishable over the cited art. Reconsideration and withdrawal of the rejection are requested.

#### Conclusion

As evidenced by the foregoing amendments and remarks, it is respectfully submitted that the present application is in form to be passed to allowance. Accordingly, a notice of allowance is requested. Should the Examiner have any questions or suggestions, applicants'

undersigned attorney requests that the Examiner initiate a telephone call to expedite prosecution of the application.

Respectfully submitted,



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